

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PEDIPEP INFANT FOOTWEAR LLC,

Plaintiff,

v.

KUDOS LEATHERGOODS LTD d/b/a JACK  
AND LILY and ROBERT THOMAS BUELL,  
Individually,

Defendants

08-CIV-3572 (LTS)

**DEFENDANTS' STATEMENT OF  
INITIAL DISCLOSURES  
PURSUANT TO FED. R. CIV. P. 26(a)(1)**

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant Robert Thomas Buell ("Buell" or "Defendant") provides his initial disclosures to Plaintiff Pediped Infant Footwear LLC ("Pediped" or "Plaintiff") herein as follows:

(A) Individuals and Subject Matter

The following individuals are likely to have discoverable information that Defendant may use to support his claims and defenses, and which is relevant to disputed facts alleged with particularity in the pleadings in this case:

Name	Subject Matter
Robert T. Buell	<ul style="list-style-type: none"><li>• Knowledge of the product development</li><li>• Knowledgeable of marketing and promotion</li><li>• Knowledgeable regarding distribution and sales</li><li>• Knowledge on lack of likelihood of confusion</li><li>• Knowledgeable of third party use of alleged intellectual property</li></ul>
Yang-Neng Leong	<ul style="list-style-type: none"><li>• Knowledge of the product production</li><li>• Knowledgeable of marketing and promotion</li><li>• Knowledgeable regarding distribution and sales</li></ul>
Alvin Koh	<ul style="list-style-type: none"><li>• Knowledgeable of distribution, sales, profits, costs</li></ul>

The above-listed witnesses may be contacted through counsel for the Defendant.

Name	Contact	Subject Matter
Miranda Ran	No. 3-4012 Jinxing Garden Sunstar Cheng Chaoyang District Beijing, China 86-13311 362362	Knowledge of the product development, product design, product manufacturing and production
Sue Lee	5605 Dunbar St. #204 Vancouver, BC 604-684-4123	Knowledgeable of product development, product design
Win Liu	2180 W 43 <sup>rd</sup> Avenue #402 Vancouver, BC 604-266-9901	Knowledgeable of product development, product design
Cory Ripley	25 E. 6th Ave. #2 Vancouver, BC 604-873-1583	Knowledgeable of packaging design

(B) Documents and Things

Defendant may use the following categories of documents to support his claims and defenses:

1. Samples of third party use of alleged intellectual property of Plaintiff;
2. Documents related to Defendants' product development, product design and packaging design; and
3. Documents relating to the manufacture and production of Defendants' product and packaging

All documents and things in Defendant's possession, custody or control are located at the offices of Kudos Leathergoods Ltd.

(C) Insurance Agreement

Defendant does not have an insurance agreement applicable to this case.

Dated: New York, New York  
August 15, 2008

By: /s/ Robert E. Hanlon  
Robert E. Hanlon (RH-8794)  
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*Attorneys for Defendant Robert Thomas  
Buell*